



**MCI Telecommunications
Corporation**

1801 Pennsylvania Avenue, NW
Washington, DC 20006
202 887 2307
FAX 202 887 3175

Susan Jin Davis
Senior Counsel
Federal Law and Public Policy

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April 2, 1998

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APR - 2 1998

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Presentation in CC Docket No. 97-231; CC Docket No. 97-121; CC Docket No. 97-208; CC Docket No. 97-137

Dear Ms. Salas:

On Thursday, April 2, 1998, Jo Gentry, Senior Manager of Western Financial Operations, Don Price, Senior Regional Manager of Competition Policy, Ronald Martinez, Executive Staff, Karen Reidy, Attorney, Jerome Epstein and Paul W. Cobb of Jenner and Block, and the undersigned, met with Carol Matthey, Jeannie Su, Jonathan Askin, Michelle Carey, David Kirschner, Bill Bailey, Susan Launer, Liz Nightingale, Audrey Wright, and Claudia Fox of the Policy Division and Greg Cooke and Erin Duffy of the Network Services Division.

The purpose of the meeting was to discuss certain checklist issues in the Southwestern Bell region. The attached document outlines the topics discussed.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Susan Jin Davis
Susan Jin Davis (lvj)

Attachments

cc:	Michael Pryor	Jonathan Askin
	Carol Matthey	Jeannie Su
	Melissa Newman	Erin Duffy
	David Kirschner	Michelle Carey
	Liz Nightingale	Susan Launer
	Bill Bailey	Audrey Wright
	Claudia Fox	Greg Cooke

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SWBT: STATUS OF SELECTED CHECKLIST ISSUES

MCI Telecommunications
Corporation

April 2, 1998





SWBT Region Overview

→ History

→ Status of Regulatory Cases:

- 271 docket
- Enforcement Actions
 - UNE Dedicated Transport
 - Access to DA Database in Bulk
- Implementation Schedule in TX



Status - Cont.

→ 252 Appeal:

- Combinations
- TELRIC
- Subloop unbundling, dark fiber
- Unbranding of live operators
- Access to DA database



ILNP Cutovers

➔ Process MCI wants:

- Firm Order Commitments: verify receipt of order and establishment of due dates
- Process for tracking of status of orders
- Coordinating actual cutover:
 - Adhere to due date or
 - Notification of due date change
 - Appropriate personnel at site for actual cutover



ILNP - Cont.

➔ SWBT Performance:

- FOC process: SWBT doesn't adhere to due dates and times
- Failure to coordinate: botched cutovers
- Specific problems

➔ Competitive impact: causes customers to be out of service for significant periods of time

➔ Delayed Permanent LNP deployment requires working ILNP cutover process



Failure to Load NXX Codes

➔ MCI Proposed Process:

- Follow exactly LERG
- Testing using mechanized processes
- Confirm MCI NXX loading and testing
- Notify all parties of new NXXs: Parity



NXX - Cont.

→ Customer consequence:

- Customers cannot receive calls from switches that do not have MCI NXXs loaded

→ Results of MCI testing:

- Over 74% of SWBT offices tested in Dallas, Houston, San Antonio incapable of receiving calls
- After testing, customer w/o service for 12 hrs

→ Difficult for competitors to monitor

→ Even BST promised testing and notification



OS/DA

→ Nondiscriminatory access:

- Access to all listings in bulk, including ITCs
- Cost-based pricing
- Ability to provide own DA/OS

→ Specific problems:

- Refusal to provide DA listings in bulk
 - Required queries from our operators
- Demand for market price (SWBT claims DA listings are not UNEs)
- Demand for licenses
- Restriction on use of OS/DA services:
 - Requires use of SWBT OS/DA for entire NXX



ULS/Customized Routing

- Refusal to provide customized routing necessary for MCI to provide own OS/DA services:
 - MCI request:
 - Feature Group D signaling to route calls
 - Route customer calls to particular NXXs via dedicated trunking
 - Route intraLATA calls to MCI or to customer's PIC
 - Code Conversion to MCI's number
 - Route overflow to SWBT's common facilities
 - Demand for exorbitant pricing without cost-support:
 - \$350,000 upfront charge: for what?
 - Per line class code charge
 - SWBT unilaterally decides Line Class Code v. AIN
 - Claims technical infeasibility



Unbundled Dedicated Transport

→ Problem:

- SWBT refused to allow MCI to use unbundled dedicated transport to transport calls to GTE in Houston
- GTE requirement
- Recent Texas Arbitrator's Award on MCI complaint ordered SWBT to provide UDT
 - SWBT may challenge



Interconnection

→ Problem:

- Failure to comply with I/A on two-way trunking:
 - For traffic that terminates with MCI, SWBT has refused to provide two-way trunks, arguing that SWBT is unable to monitor and bill the usage on such trunks
- MCI intends to use two-way trunking for testing
- SWBT uses two-way trunking for testing



White Page Listings

→ Problem:

- No process to allow MCI to review customers' white page listings information prior to publication:
 - MCI has no visibility to white page database
 - MCI has no means to verify accuracy of white page listings



911

→Problems:

- No process to verify accuracy of 911 databases
- Refusal to provide redundant, diverse 911 trunks
 - Business and safety decision: would allow at least two separate trunk paths to reach the public safety answering point in case one of the paths experiencing outage
 - Recommended industry procedure by National Emergency Number Association
 - SWBT-unique problem



Bad Acts

- ➔ Inflammatory letters sent to MCI test customers
 - Claims of slamming
 - Threats to disconnect